

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

10-CV-6005 (RWS)

THE CITY OF NEW YORK et al.,

Defendants.

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**DECLARATION OF JON L. NORINSBERG IN SUPPORT OF
THE NORINSBERG TEAM'S MOTION FOR RECONSIDERATION**

JON L. NORINSBERG, an attorney admitted to practice in the State of New York, declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, as follows:

1. I am one of the attorneys of record for plaintiff Adrian Schoolcraft in the above-captioned action. As such, I am familiar with the facts and circumstances concerning the prosecution of this action, and I submit this Declaration in support of the Norinsberg Team's motion for reconsideration of the Court's Order, dated September 6, 2016, reducing our hourly rates by 35%.

2. In the past few months, I have been retained by two separate clients, R.W. and A.X, who have readily agreed to pay my requested rate of \$600.00 per hour.¹ (Ex. A & Ex. B). There was no negotiation whatsoever over these rates. I informed the clients of my billing rate, and this rate was immediately accepted by both clients without any further discussion.

¹ The names of the clients have been redacted for privacy reasons.

3. Similarly, in September 2014, a third client, BM, agreed to pay an hourly rate of \$500.00 per hour. (*Id.*, Ex. C), which represented my billing rate in the Southern District two years ago.

4. Cohen & Fitch's standard retainer agreements expressly state that their billing rate is \$500.00 per hour. (*Id.*, Ex. D). There was no negotiation whatsoever over these rates. Cohen & Fitch informed the clients of their billing rate, and this rate was immediately accepted by their clients without any further discussion.

5. As a result of the publicity on the Schoolcraft matter, the Norinsberg Team signed up one case, Bonelli v. City of New York, 11 Civ. 0395 (KAM) (JO). This is the only case that our firms signed up in the past six years as a result of the Schoolcraft matter.

6. The Bonelli matter was a highly lucrative case that ultimately settled for \$1.1 million dollars. However, because of the enormous work that needed to be done on the Schoolcraft matter, we were not able to handle the Bonelli case at the same time, and had to refer it out to another civil rights firm, Jacob & Hazen.

7. In the past six years, our firms have appeared before this Court only on *one* other case, Stinson v. City of New York, 10 Civ. 4228 (RWS), which was a 'related action' filed *prior* to the Schoolcraft matter. Apart from Stinson, there have been no other matters that we appeared in court before Your Honor in the past six years.

Dated: New York, New York
September 14, 2016

Respectfully submitted,



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